

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTONLE'TAXIONE
PLAINTIFF,Civil Action NO. 2:22-cv-00078-MKD

V.

COUNTY OF SPOKANE, MR. SPARBER
(Jail Commander), Lt. WIRTH,
Sgt. Purcell, Sgt. Hill, Officer
Smith, Classification Unit,
MAIL ROOM STAFF #1493, MR. Scott
(Kitchen) et al., DEFENDANTS,
in individual and official capacitiesJudge
Magistrate Judge
FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
APR 22 2022
SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

42 U.S.C § 1983

JURY TRIAL DEMANDED

COMPLAINT
INTRODUCTION1. PLAINTIFF LE'TAXIONE IS IN PRE-TRIAL DETENTION
CUSTODY AT THE SPOKANE COUNTY JAIL.DECLARATION OF LE'TAXIONE

PURSUANT TO 28 U.S.C. § 1746 I DECLARE AS FOLLOWS:

2. MY LEGAL NAME IS LE'TAXIONE AND I AM COMPETENT
TO MAKE THIS DECLARATION AND THE FOLLOWING IS TRUE AND CORRECT
TO THE BEST OF MY KNOWLEDGE.3. I HAVE BEEN IN PRETRIAL DETENTION CUSTODY AT
THE SPOKANE COUNTY JAIL FOR 16 MONTHS (DEC. 2021 - APRIL 2022)4. IN THE 16 MONTHS THAT I'VE BEEN INCARCERATED
IN THE SPOKANE COUNTY JAIL I'VE EXPERIENCED RACIAL AND RELIGIOUS
DISCRIMINATION AT THE HANDS OF JAIL LEADERSHIP AND STAFF.

5. For the entire 10 months of my incarceration in pre-trial detention at the Spokane County Jail I've written grievances and official misconduct complaints all the way up the chain to Mr. Sparber (Jail Commander) documenting the racial and religious discrimination and the disappearance of grievances and legal mail which denied me of my Freedom of Religious Exercise and Expression, my Due Process and Equal Protection Rights and my rights to access the courts (1st, 14th, and 16th Amendment Rights).

6. On April 5, 2022 I wrote another Official misconduct Complaint to Mr. Sparber (Jail Commander) expressing the racial and religious discrimination that I'd been experiencing as an Orthodox HANAFI Muslim and being forced to eat a vegetarian meal which is against the Holy Koran Ch. 2:168, Ch. 22:28, and Islamic Jurisprudence found in "Ascent to Felicity: A Manual on Islamic Creed and HANAFI Jurisprudence" pages 169-183.

7. On April 5, 2022 I was arbitrarily and capriciously moved to solitary confinement when the Classification Unit (I don't know their names) came to my minimum security dorm, where I'd been housed for 10 months, and asked about my grievance against Officer Smith. Then stated that Lt. Wirth had ordered that I be moved

Due to my GRIEVANCES AND my advocate MICHELE DANIELI'S calling the jail and complaining about my treatment by STAFF.

8. ON April 6th or 7th 2022 I ARRANGED ALL OF my GRIEVANCES AND OFFICIAL MISCONDUCT COMPLAINTS, THAT COVERED my 16 months of incarceration at the SPOKANE COUNTY JAIL, INTO EXHIBITS AND FILED A 2nd COUNT 42 U.S.C § 1983 COMPLAINT AGAINST SPOKANE COUNTY AND ALL NAMED DEFENDANTS "EXCEPT THE MAILROOM STAFF" TO THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON WHICH WAS GIVEN TO OFFICER NOESEN WHO ACKNOWLEDGES THE LARGE MANILLA ENVELOPE MARKED LEGAL MAIL AND STATED THAT HE'D IN FACT SENT THE LEGAL MAIL TO THE MAILROOM.

9. ON APRIL 11, 2022 I WROTE TO THE MAIL DESK INQUIRING ABOUT MY MANILLA ENVELOPE FILED THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON. STAFF MEMBER #1493 RETURNED MY MAIL DESK INQUIRY STATING "I DO NOT SEE THAT THIS MAILROOM HAS RECEIVED THAT ENVELOPE TO MAIL OUT." (COMMUNICATION ENCLOSED).

I declare under the penalty of perjury that the foregoing is true and correct.

ReTaxone®

Executed on this 17th day of April 2022 at Spokane, WA.

SPOKANE COUNTY DETENTION SERVICES

INMATE GRIEVANCE / COMPLAINTYOUR NAME: LETAXIONE

Last

First

MI

CCID # 448740DATE: 4-5-22CELL ASSIGNMENT: 6E7

Write below the details of your complaint:

ON 4-5-22 AT APPROX. 12:00pm I WAS PULLED OUT OF MY DORM BY CLASSIFICATION WITH QUESTIONED ME ABOUT OFFICER SMITH WITH I FILED A GRIEVANCE AGAINST HIM NOT WEREING HIS PIRSE. I HAVE BEEN PLACED IN SOLITARY CONFINEMENT. I HAVE BEEN RETALIATED AGAINST FOR FILING GRIEVANCES AND SEPARATED FROM THE ONLY MUSLIMS THAT I KNOW OF IN THE SPOKANE COUNTY JAIL WHICH PROSCRIBES ME FROM HAVING ANY CONTACT WITH MUSLIMS AND NO WAY TO HAVE CONGREGATIONAL PRAYERS WHICH IS MANDATED BY THE HOLY KORAN (MUSLIM BIBLE) SURV 62.

RECEIVED BY: _____

DATE: _____

ACTION TAKEN: _____

Noted

SIGNED OFF BY: Sgt HillDATE: 4.6.22

C: Jail Commander
Corrections Lieutenant
Office Supervisor

Classification
Inmate File
Nurse Supervisor

SPOKANE COUNTY DETENTION SERVICES
INMATE REQUESTReceiving
Officer:Housing Unit: 10E7PERS # 274Date: 4-11-22Date: 04/11/22Inmate: LETHAIDONE12-15-64 408740

LAST NAME

FIRST NAME

DOB

CCID

JAIL DEPARTMENTS

- ☐ Admin ☐ Jail Records ☐ Programs
☐ Classification ☐ Kitchen ☐ Sergeants
☐ Commissary ☐ Law Library ☐ Property #
☐ Education/GED ☐ Chaplain ☒ Mail Desk

OTHER AGENCIES

- ☐ City Public Defender ☐ Sheriff Records ☐ Counsel for Defense
☐ County Public Defender ☐ Spokane PD Records ☐ Municipal Court
☐ District Court ☐ Superior Court ☐ Other
☐ DOC ☐ US Marshall's

* Medical and Mental Health Requests must use a Medical Request Form

** USE A SEPARATE FORM FOR EACH REQUEST **

Explanation:

I sent a ninailla envelope full of legal pleading out from HUSSELL ON 4-6 or 4-7-22
 did not get mail room to tell U.S. District Court Eastern District of Washington.

***** DO NOT WRITE BELOW THIS LINE - JAIL STAFF ONLY *****

Reason:

I do not see that this mailroom has received
 that envelope to mail out.

Responding Staff:

QD 1493

Date:

4/12/22EXHIBIT